

**CONTRACT  
EVIDENCE  
AUDIT  
TEAM**

September 12, 1994

Ms. Lisa Comer  
U.S. EPA Office of Enforcement  
Mail Code 5502G  
401 M Street SW  
Washington, DC 20460

RE: Transmittal of Draft Work Products for the American Chemical Services Site

Dear Ms. Comer:

At the direction of the National Enforcement Investigations Center (NEIC) the Contract Evidence Audit Team (CEAT-TechLaw) is transmitting under custody seals the following American Chemical Services draft work products:

- Spreadsheets and responses to volumetric challenges for the following companies:

Diosynth, Inc.

*Exemption 5 - Deliberative Process*

If you have any questions regarding this work effort, please contact us at (303) 233-1248.

Sincerely,

*Elaine Rippey*  
Elaine Rippey  
Project Manager

ER

Enclosures

cc: Mary Rohrer, NEIC (w/o enclosures)  
Mary Franquemont, CEAT (w/o enclosures)

IF: 232-877

Lisa,

9/9/94

Attached are the spreadsheets for the following PRPs:

Diosynth, Inc.

*Exemption 5 - Deliberative Process*

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Diosynth, Inc. claims their materials would have no impact at ACS based on: materials contain high amounts of water; material was shipped in bulk not drums, therefore no leakage; and the materials were to be used as fuel by ACS thus no reclamation or incineration. They provided copies of evaluations of the materials they shipped to ACS to back these claims. No changes were made based on these claims and this review agrees with the database volume.

*Exemption 5 - Deliberative Process*

DIOSYNTH, INC.

	LBS. LISTED IN DATABASE	VOLUMETRIC REVIEW
Total reduced lbs. for 1980 - 1990	7,560.00	7,560.00
Total reduced lbs. for 1976 - 1980	0.00	0.00
Total reduced lbs. for 1955 - 1975	0.00	0.00
TOTAL REDUCED LBS. for 1955 -1990	7,560.00	7,560.00
PRP percent ranking	0.019949 %	0.019949 %
PRP FINAL PAYMENT DUE	\$28,435.88	\$28,435.88

Revised payment to participate in de minimis settlement is \$28,435.88.

Detail of volume count for 1980 - 1990 for DIOSYNTH, INC.  
9/9/94

From manifests

3/25/86	5,500.00
10/26/87	5,500.00
8/17/87	5,500.00
2/18/87	5,500.00
2/10/88	5,500.00
6/29/88	5,000.00
7/11/88	4,900.00
12/21/88	5,000.00
3/31/89	4,900.00
5/15/89	5,000.00
7/24/89	5,500.00
7/24/89	5,000.00
8/7/89	5,400.00
11/13/89	5,500.00
12/11/89	5,000.00
12/15/89	5,500.00
1/30/90	5,200.00
6/26/90	5,100.00

-----	94,500.00	total gallons
x	8	@ 8 lbs. per gallon
-----	756,000.00	total lbs. for 1980 - 1990
x	.01	reduced 99% for 1980-1990 timeframe
-----	7,560.00	Total reduced lbs. for 1980-1990

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

RANK	GENERATOR	1955 - 1990 TOTAL POUNDS	1975 POUNDS	1976 - NOV. 10, 1980 POUNDS	1976 - NOV. 11, 1980 POUNDS	PERCENT RANKING	FINAL PAYMENT DUE
685	AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.	585.20	0.00	0.00	585.20	0.001544	2,201.15

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

<u>RANK</u>	<u>GENERATOR</u>	<u>1955 - 1990 TOTAL POUNDS</u>	<u>1955 - 1975 POUNDS</u>	<u>1976 - NOV. 10, 1980 POUNDS</u>	<u>1976 - NOV. 11, 1980 POUNDS</u>	<u>PERCENT RANKING</u>	<u>FINAL PAYMENT DUE</u>
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*Exemption 5 - Deliberative Process*

310 DIOSYNTH, INC.	7,560.00	0.00	0.00	7,560.00	0.019949	28,435.88
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*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

RANK	GENERATOR	1955 - 1990			1975 - 1990			1976 - NOV. 11, 1990			FINAL PAYMENT	
		TOTAL POUNDS	POUNDS	POUNDS	POUNDS	POUNDS	POUNDS	PERCENT RANKING	PERCENT RANKING	POUNDS	DUFE	
685	AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.	\$85.20	0.00	0.00	\$85.20	0.00	\$85.20	0.001564	0.001564	2,201.15		

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

RANK	GENERATOR	TOTAL POUNDS	POUNDS	1955 - 1990	1955 - 1975	NOV. 10, 1980	1976 - NOV. 11, 1980	- 1990	PERCENT	FINAL PAYMENT	DUUE
Exemption 5 - Deliberative Process											
310	DIOSMITH, INC.	7,560.00	0.00	0.00			7,560.00	0.019949	0.019949	28,435.88	

Exemption 5 - Deliberative Process

05/05/94

AMERICAN CHEMICAL SERVICES SITE  
MAILING LIST

PAGE: 2

*Exemption 5 - Deliberative Process*

AKZO RESINS AND VEHICLES  
AKA S.R. PREMIER, INC.  
150 SOUTH FAIRBANKS  
ADDISON, IL 60101

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*



*Exemption 5 - Deliberative Process*



DIOSYNTH, INC.  
3432 WEST HENDERSON STREET  
CHICAGO, IL 60618

*Exemption 5 - Deliberative Process*



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AMERICAN CHEMICAL SERVICES SITE  
COMMENT LISTING

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09/20/94

PAGE: 4

GENERATOR: AKZO RESINS AND VEHICLES,  
AKA S.R. PREMIER, INC.

Comments

THESE TOTALS INCLUDE S.R. PREMIUM INK VOLUMES WHICH HAD BEEN ENTERED AS A SEPARATE RECORD IN THE DATABASE PROVIDED BY THF.

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GENERATOR: ALBERTO-CULVER CO.

Comments

THE ADDRESS USED WAS OBTAINED FROM A LIBRARY SEARCH.

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*Exemption 5 - Deliberative Process*



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AMERICAN CHEMICAL SERVICES SITE

09/20/94

COMMENT LISTING

PAGE: 37

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*Exemption 5 - Deliberative Process*

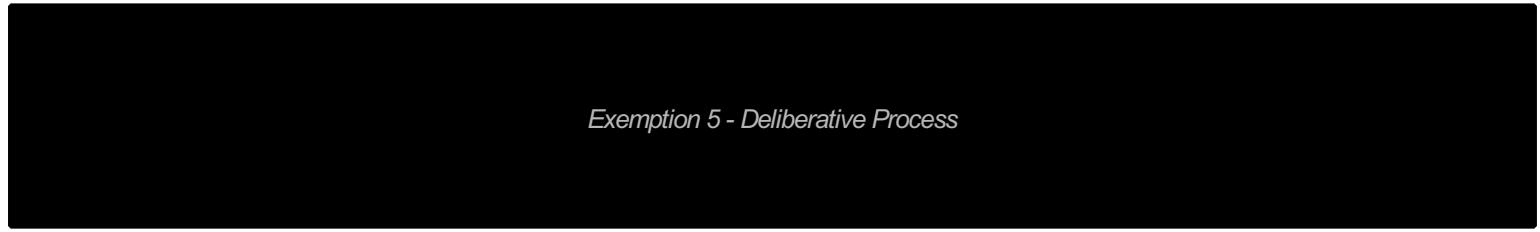


GENERATOR: DIOSYNTH, INC.

Comments

9/9/94 (ER) POST MAILING CHALLENGE - CREATED SPREADSHEET FOR CALCULATION OF VOLUME AND PAYMENT DUE. CEAT REVIEW: 7,560.00 TOTAL REDUCED LBS., \$28,435.88 PAYMENT DUE.

*Exemption 5 - Deliberative Process*



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AMERICAN CHEMICAL SERVICES SITE  
POSTAL NUMBER LISTING

06/14/94

PAGE: 1

GENERATOR

POSTAL NUMBER

GENERATOR	POSTAL NUMBER

*Exemption 5 - Deliberative Process*

AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.

P 028 909 172

*Exemption 5 - Deliberative Process*

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AMERICAN CHEMICAL SERVICES SITE  
POSTAL NUMBER LISTING

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06/14/94

PAGE: 8

GENERATOR

POSTAL NUMBER

[REDACTED]

*Exemption 5 - Deliberative Process*

DIOSYNTH, INC.

P 028 909 546

[REDACTED]

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
DATE LETTER RECEIVED  
PREPARED BY CEAT - TECHLAW 09/13/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

GENERATOR

DATE  
RECEIVED

*Exemption 5 - Deliberative Process*

AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.

06/16/94

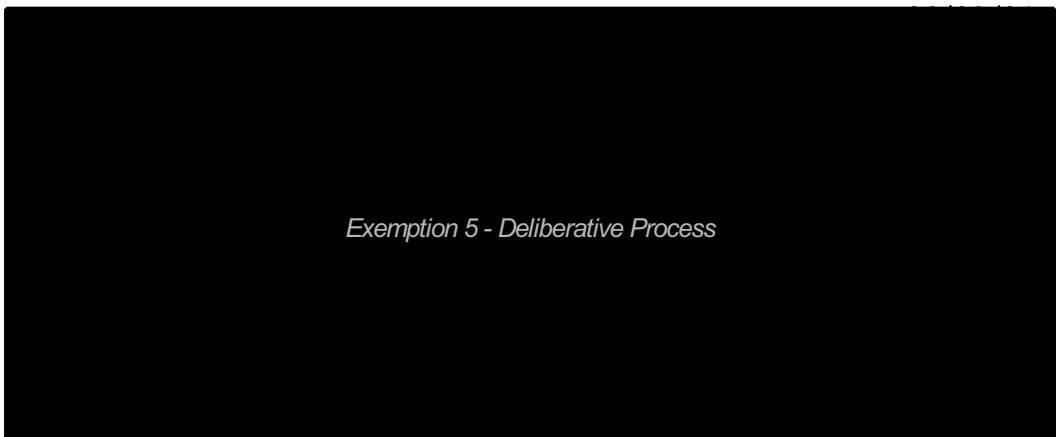
*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
DATE LETTER RECEIVED  
PREPARED BY CEAT - TECHLAW 09/13/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

GENERATOR

DATE  
RECEIVED

*Exemption 5 - Deliberative Process*



DIOSYNTH, INC.

06/17/94

*Exemption 5 - Deliberative Process*



AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 GROSS INCINERATED/RECLAIMED POUNDS SORTED ALPHABETICALLY  
PREPARED BY CEAT - TECHLAW 06/20/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR	1955 - 1990 TOTAL POUNDS	1955 - 1975 POUNDS	1976 - NOV. 10, 1980 POUNDS	NOV. 11, 1980 - 1990 POUNDS
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*Exemption 5 - Deliberative Process*

685 AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC. 65,835.00 0.00 0.00 65,835.00

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 GROSS INCINERATED/RECLAIMED POUNDS SORTED ALPHABETICALLY  
PREPARED BY CEAT - TECHLAW 06/20/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR	1955 - 1990 TOTAL POUNDS	1955 - 1975 POUNDS	1976 - NOV. 10, 1980 POUNDS	NOV. 11, 1980 - 1990 POUNDS
310	DIOSYNTH, INC.			850,500.00	0.00

*Exemption 5 - Deliberative Process*

310 DIOSYNTH, INC. 850,500.00 0.00 0.00 850,500.00

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED BY VOLUME  
PREPARED 05/26/94 FOR EPA REGION V

RANK	GENERATOR	1955 - 1990		1955 - 1975		Nov. 10, 1980		NOV. 11, 1980		PERCENT RANKING	FINAL PAYMENT DUE
		TOTAL	POUNDS	POUNDS	POUNDS	POUNDS	POUNDS	POUNDS	POUNDS		
<i>Exemption 5 - Deliberative Process</i>											
310	DIOSYNTH, INC.		7,560.00	0.00	0.00	7,560.00	0.019949	28,435.88			

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED BY VOLUME  
PREPARED 05/26/94 FOR EPA REGION V

RANK	GENERATOR	1955 - 1990 <u>TOTAL POUNDS</u>	1955 - 1975 <u>POUNDS</u>	1976 - <u>POUNDS</u>	NOV. 11, 1980 <u>POUNDS</u>	PERCENT RANKING	FINAL PAYMENT <u>DUUE</u>
685	AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.	585.20	0.00	0.00	585.20	0.001544	2,201.15

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

<u>RANK</u>	<u>GENERATOR</u>	<u>1955 - 1990</u>	<u>1955 - 1975</u>	<u>NOV. 10, 1980</u>	<u>NOV. 11, 1980</u>	<u>PERCENT</u>	<u>FINAL PAYMENT</u>
		<u>TOTAL POUNDS</u>	<u>POUNDS</u>	<u>POUNDS</u>	<u>POUNDS</u>	<u>RANKING</u>	<u>DUUE</u>
685	AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.	585.20	0.00	0.00	585.20	0.001544	2,201.15

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED 05/26/94 FOR EPA REGION V

<u>RANK</u>	<u>GENERATOR</u>	<u>1955 - 1990 TOTAL POUNDS</u>	<u>1955 - 1975 POUNDS</u>	<u>1976 - NOV. 10, 1980 POUNDS</u>	<u>NOV. 11, 1980 - 1990 POUNDS</u>	<u>PERCENT RANKING</u>	<u>FINAL PAYMENT DUE</u>
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*Exemption 5 - Deliberative Process*

310 DITOSYNTH, INC.	7,560.00	0.00	0.00	7,560.00	0.019949	28,435.88
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*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED BY VOLUME  
PREPARED BY CEAT - TECHLAW 05/12/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR	1955 - 1990		1955 - 1975		1976 - Nov. 1980		1990		PERCENT		FINAL PAYMENT		ACTUAL COST	
		TOTAL POUNDS	POUNDS	TOTAL POUNDS	POUNDS	POUNDS	POUNDS	RANKING	DUE	\$	31,781.23	\$	31,781.23	\$	31,781.23
296	CATALIN CORPORATION OF AMERICA	8,469.40	8,449.40	0.00	0.00	0.00	0.00	0.022296	0.022296	\$	31,781.23	\$	31,781.23	\$	31,781.23
310	DIOSYNTH, INC.	7,560.00	0.00	0.00	0.00	7,560.00	0.019949	28,435.88	28,435.88	\$	28,435.88	\$	28,435.88	\$	28,435.88

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED BY VOLUME  
PREPARED BY CEAT - TECHLAW 05/12/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR	TOTAL POUNDS	POUNDS	1955 - 1990	1955 - 1975	NOV. 10, 1980	NOV. 11, 1980	PERCENT	FINAL PAYMENT	ACTUAL COST
				POUNDS	POUNDS	POUNDS	POUNDS	RANKING	DUUE	COST
685	AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.	585.20	0.00	0.00	0.00	585.20	0.001544	2,201.15	2,201.15	

*Exemption 5 - Deliberative Process*

685 AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC. 585.20 0.00 0.00 585.20 0.001544 2,201.15 2,201.15

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED BY CEAT - TECHLAW 05/12/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR	TOTAL POUNDS	POUNDS	1976 - NOV. 10, 1980	1976 - NOV. 11, 1980	PERCENT	FINAL PAYMENT	ACTUAL COST
1315	ADA METAL PROD	48.00	0.00	0.00	48.00	0.000127	\$ 500.00	\$ 180.55

*Exemption 5 - Deliberative Process*

685 AKZO RESINS AND VEHICLES, AKA S.R. PREMIER, INC.

RANK	GENERATOR	TOTAL POUNDS	POUNDS	1976 - NOV. 10, 1980	1976 - NOV. 11, 1980	PERCENT	FINAL PAYMENT	ACTUAL COST
1315	ADA METAL PROD	48.00	0.00	0.00	48.00	0.000127	\$ 500.00	\$ 180.55

*Exemption 5 - Deliberative Process*

AMERICAN CHEMICAL SERVICES SITE  
1955 - 1990 TOTAL REDUCED POUNDS SORTED ALPHABETICALLY  
PREPARED BY CEAT - TECHLAW 05/12/94 FOR EPA REGION V  
ATTORNEY WORK PRODUCT - DO NOT RELEASE

RANK	GENERATOR			1976	-	NOV.	11,1980	PERCENT	FINAL PAYMENT	DUE	ACTUAL COST
		TOTAL	POUNDS	1990	1975	NOV.	10,1980				
310	DIOSYNTH, INC.			7,560.00	0.00	0.00	7,560.00	0.019249	28,435.88	28,435.88	

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

## LIST OF GENERATORS AND THEIR ASSOCIATED COMPANIES

In consultation with the project contacts, the CEAT determined that many generators were associated with one another, but that their names appeared in different forms on the project documents, in the PRPs' database, on acquired mailing lists, and through research materials. This list may be used to identify a generator and where information regarding that generator may be found in the database and in the project files. The list also cross-references a generator with associated generators, and identifies instances where the files and database records were combined.

- The name which appears before the designations *AKA*, *DBA*, *FKA*, or *NKA* is the name under which the documents are filed and that appears in the database. For example, if the list indicates [REDACTED] *Exemption 5 - Deliberative Process* [REDACTED] the waste volumes for these generators were combined in the database and the documents are filed under [REDACTED]  
*Exemption 5 - Deliberative Proc...*
- If a generator name is followed by the designation *SEE*, the waste volumes in the database and documents can be found under the name listed after the designation *SEE*. For example, if the list indicates [REDACTED] *Exemption 5 - Deliberative Process* [REDACTED] the volumes were combined in the database and the documents were placed under *Exemption 5 - Deliberative Process*
- An asterisk (\*) denotes a generator record from the database that was combined by the CEAT with another generator record. The generator record marked with the asterisk was then deleted from the database. For example, the entry [REDACTED] *Exemption 5 - Deliberative Process* [REDACTED] had a record in the database and, based on the criteria for combining generator records, the waste volumes for [REDACTED] *Exemption 5 - Deliberative Pr...* [REDACTED] were combined with [REDACTED] *Exemption 5 - Deliberative Process* Because the [REDACTED] *Exemption 5 - Deliberative ...* [REDACTED] record was combined with [REDACTED] *Exemption 5 - Deliberative Process* [REDACTED] record was deleted from the database to ensure no duplication of the data occurred.

[REDACTED]  
*Exemption 5 - Deliberative Process*

- AKZO RESINS AND VEHICLES AKA S.R. PREMIER INC.\*

[REDACTED]  
*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

- S.R. PREMIER INC. SEE AKZO RESINS AND VEHICLES

*Exemption 5 - Deliberative Process*

*Exemption 5 - Deliberative Process*

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## AMERICAN CHEMICAL SERVICES - VOLUMETRIC CHALLENGE REPORT

09/20/94

APPENDIX 4				VOLUMETRIC CHALLENGES			
COMPANY NAME	TOTAL VOLUME	REDUCE AMOUNT	SETTLEMENT AMOUNT	TOTAL VOLUME	REDUCE AMOUNT	SETTLEMENT AMOUNT	ABILITY TO PAY AMOUNT
Diosynth, Inc.	7,560.00	\$28,435.88	7,560.00	\$28,435.88	N/A		

*Exemption 5 - Deliberative Process*

APPENDIX 4				VOLUMETRIC CHALLENGES			
COMPANY NAME	TOTAL VOLUME	REDUCE AMOUNT	SETTLEMENT AMOUNT	TOTAL VOLUME	REDUCE AMOUNT	SETTLEMENT AMOUNT	ABILITY TO PAY AMOUNT
Diosynth, Inc.	7,560.00	\$28,435.88	7,560.00	\$28,435.88	N/A		

*Exemption 5 - Deliberative Process*

\* Ability to pay assessment also completed.